

Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Louisiana Pollutant Discharge Elimination System (LPDES)
General Permit Authorization No.: LAG533084
Agency Interest No.: 88152
Activity No.: GEN20080001

By: Gene Jarreau
March 24, 2009

I. APPLICANT:

Company:
LDH Energy Olefins, LLC
11135 Industriplex Blvd., Suite 1500
Baton Rouge, LA 70809

Facility:
Chalmette Gas Processing Plant
1701 Paris Road, Gate 50 (ExxonMobil-Chalmette Refining Property)
Chalmette, LA 70044

Cognizant Official Telephone Number: (225) 906-9900

II. PERMIT STATUS:

The Office of Environmental Services (OES) has received an application dated November 7, 2008 for issuance of a LPDES permit.

Issuing LPDES General Permit:
Class I-Sanitary-General-Permit,-treated sanitary-wastewater-totaling-less than 5,000
gallons per day (GPD) maximum quantity

Final Effluent Limitations and Monitoring Requirements:
Part I, Section B, Page 4 of 16 (Schedule B)

Prior LPDES Permit:

Permit Number:	N/A
Date Issued:	N/A
Expiration Date:	N/A

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III. FACILITY INFORMATION:

Facility Location: 1701 Paris Road,
Gate 50 (ExxonMobil-Chalmette Refining Property)
Chalmette, LA
St. Bernard Parish
Facility Type: gas processing plant
Number of Outfalls: 1
Facility Coordinates:
Latitude: 29 56 03
Longitude: 89 58 04
SIC Code: 2911
(The facility submitted this application for coverage under SIC Code 1321. However, this classification is reserved for establishments primarily engaged in producing liquid hydrocarbons from oil and gas field gases. This facility recovers liquefied petroleum gases incidental to **petroleum refining**, which is a classification for coverage under SIC Code 2911. This is according to an e-mail dated August 12, 2008 from EPA.)

IV. OUTFALL INFORMATION:

Outfall 01S

Discharge Description: treated sanitary wastewater
Parish: St. Bernard
Outfall Flow: 250 GPD
Outfall Location: at the point of discharge from the sewer treatment plant, located 200 feet south of the levee, 140 feet south of Gate 29 XOM-Chalmette Refining property, parallel to Paris Road, running North, prior to combining with any other waters
Discharge Route: by pipe, thence into unnamed ditch, thence into the Delaronde Canal and the 40 Arpent Canal, thence into the marsh of Bayou Bienvenue
LDEQ Subsegment Number: 041801
Effluent Limits Basis: Water Quality Regulations, LAC 33:IX.2515 and 2701
Wastewater Treatment: Mechanical and Chlorination

V. RECEIVING WATERS

Subsegment Number: 041801
Basin: Lake Pontchartrain

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The designated uses of this subsegment are:

- a. primary contact recreation
- b. secondary contact recreation
- c. fish and wildlife propagation

303(d)/TMDL Status:

Subsegment 041801, Bayou Bienvenue – from headwaters to hurricane gate at Mississippi River Gulf Outlet (Estuarine), is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDLs have been established. A reopener clause has been established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

VI. HISTORY / COMMENTS

A. Compliance History

1. OEC: There are no open, appealed, or pending enforcement actions as of March 23, 2009.
2. EPA: There is no EPA enforcement history on file as of March 23, 2009.

- B. DMR Review: As of the past 3 years, the following issues regarding monitoring have been found. Stormwater discharges are covered by the Multi-Sector Storm Water General Permit authorization LAR05N036. The 2007 benchmark monitoring results show this facility did not meet all standards during the year for Lead, Zinc, Oil and Grease, COD, Total Suspended Solids, Nitrate-Nitrite, or Nitrogen; Ammonia. Thus, the facility stated they would continue to monitor in 2008. They also stated Best Management Practices would be adjusted in an effort to meet the benchmark monitoring standards in 2008. Benchmark follow-up monitoring analytical results for Oil and Grease and COD (on April 5, 2008) found no exceedances for these parameters.

- C. Inspections: A multi-media, Focused Compliance Inspection (FCI) was conducted on January 9, 2008, to gather information regarding the process associated with materials received from ExxonMobil-Chalmette Refining (and the products sent to LDH Energy Olefins LLC, Geismar Fractionation Plant). This was an EPA/LDEQ joint inspection. EPA took the lead role, and generated the official report containing a facility site review and facility concerns. According to an e-mail dated August 12, 2008 from EPA, the following information from the report is not considered Confidential Business Information (CBI):
- A portion of the process piping, including the product piping to and from ExxonMobil-Chalmette Refining, and the Natural Gas Liquid (NGL) pig launch

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station to the LDH Energy Olefins LLC, Geismar Fractionation Plant, was located outside of the stormwater containment berm which surrounds the rest of this plant. This facility did not perform the quarterly visual observations for the first quarter of 2007, and the second and third quarters of 2006. Although most of the site had very good housekeeping, the area under the compressor sheds was heavily affected by spilled compressor oil. Also, used motor oil was stored in shallow metal pans that lacked drain plugs.

The last water permit routine LDEQ Compliance Evaluation Inspection (CEI) was performed on May 13, 2004. One problem observation noted was the stormwater holding tank had a thick sheen on the surface.

The LDEQ issued a Notice of Corrected Deficiency on June 25, 2004 regarding the areas of concern noted at the time of the May 13, 2004 inspection. (The facility was not maintaining records of discharging stormwater at the time of the inspection. Since that time, the facility has started a log to keep track of the stormwater discharges. The facility was inspecting for spills / leaks on a weekly basis (instead of a daily basis), at the time of the inspection. Since that time, the facility has updated their Storm Water Pollution Prevention Plan to reflect this.)

D. Fees: \$118.80

E. Comments: This facility should receive a LPDES Class I Sanitary General Permit authorization because the treated sanitary wastewater flow is less than 5,000 GPD. The basis for the effluent limitations in this permit is the Water Quality Regulations, LAC 33:IX.2515 and 2701.